

ORIGINAL

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Lexington County
Brooks P. Goldsmith, Circuit Court Judge

CURTIS T. JOHNSON,

PETITIONER,

v.

THE STATE,

RESPONDENT.

APPELLATE CASE NO. 2019-001694

MOTION FOR AN EXTENSION OF TIME
IN WHICH TO FILE THE PETITION FOR WRIT OF
CERTIORARI AND APPENDIX

Counsel for Curtis T. Johnson respectfully requests an extension of thirty (30) days in which to file the petition for writ of certiorari and appendix in this case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. This is a second request for an extension. In support of this request, counsel shows:

1. The petition for writ of certiorari and appendix are due to be served and filed with the Court today.

2. Counsel for Curtis T. Johnson respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions previously granted and the order in which counsel attempts to manage her caseload, counsel hopes that no further extension requests will be required.

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3. Counsel is preparing and consulting with Chief Appellate Defender, Robert M. Dudek, on the initial brief of appellant and designation of matter in the cases of The State v. Carmie Josette Nelson, and The State v. Jamaa Ato Washington, Jr., which she plans to file with the Court of Appeals in the upcoming weeks, and on the petition for writ of certiorari and accompanying appendix in the cases of Booker T. Hill v. The State, Worth Edward Cook v. The State, and Stanley Wright v. The State, which she plans to file with this Court in the upcoming weeks.

4. Counsel makes this request in good faith and not for purpose of delay.

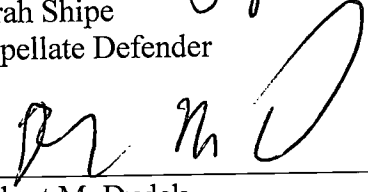
5. Counsel for the Attorney General's office has been informed of this request.

WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension, in which to file the petition for writ of certiorari and appendix in this case based upon the above exigent circumstances. Counsel requests that time limits for filing the petition for writ of certiorari and appendix be held in abeyance pending a ruling on this motion.

Respectfully submitted,



Sarah Shipe
Appellate Defender



Robert M. Dudek
Chief Appellate Defender

This 27th day of January, 2020.

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CERTIFICATE OF SERVICE

I certify that a copy of the Motion for an Extension of Time in which to file the petition for writ of certiorari and appendix in the above referenced case has been served upon Caroline M. Scrantom, Esquire, at the Rembert Dennis Building, Room 519, 1000 Assembly Street, Columbia, South Carolina 29201, this 27th day of January, 2020.


Sarah Shipe
Appellate Defender

ATTORNEY FOR PETITIONER

SUBSCRIBED AND SWORN TO before me
this 27th day of January, 2020.

 (L.S.)
Notary Public for South Carolina
My Commission Expires: December 31, 2029.